

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:)	Chapter 7
)	
DECURTIS HOLDINGS LLC, <i>et al.</i> , ¹)	Case No. 23-10548 (JKS)
)	
)	Jointly Administered
Debtors.)	

Objection Deadline: To be determined

Hearing Date: To be heard with the Trustee's Final Report

**FIRST AND FINAL APPLICATION FOR COMPENSATION
AND REIMBURSEMENT OF EXPENSES OF
PACHULSKI STANG ZIEHL & JONES LLP, AS
COUNSEL TO THE CHAPTER 7 TRUSTEE, FOR THE
PERIOD FROM AUGUST 29, 2023 THROUGH JULY 31, 2025**

Name of Applicant:	Pachulski Stang Ziehl & Jones LLP
Authorized to Provide Professional Services to:	Chapter 7 Trustee
Date of Retention:	Effective as of August 29, 2023 by order signed on or about December 26, 2023
Period for which Compensation and Reimbursement is Sought:	August 29, 2023 through July 31, 2025 ²
Amount of Compensation Sought as Actual, Reasonable and Necessary:	\$69,631.00
Amount of Expense Reimbursement Sought as Actual, Reasonable and Necessary:	\$ 793.45

This is a: ☐ monthly ☐ interim ☒ final application.

The total time expended for fee application preparation is approximately 3.0 hours
and the corresponding compensation requested is approximately \$1,500.00.

¹ The Debtors in these chapter 7 cases, along with the last four digits of each Debtor's federal tax identification number include: DeCurtis Holdings LLC (2384) and DeCurtis LLC (9241).

² The applicant reserves the right to include any time expended in the time period indicated above in future application(s) if it is not included herein.

PRIOR APPLICATIONS FILED

Date Filed	Period Covered	Requested Fees	Requested Expenses	Approved Fees	Approved Expenses

No prior fee applications have been filed.

PSZ&J PROFESSIONALS

Name of Professional Individual	Position of the Applicant, Number of Years in that Position, Prior Relevant Experience, Year of Obtaining License to Practice, Area of Expertise	Hourly Billing Rate (including Changes)	Total Hours Billed	Total Compensation
Bradford J. Sandler	Partner 2010; Member of NJ & PA Bars since 1996; Member of DE Bar since 2001; Member of NY Bar since 2008	\$1,725.00 \$1,595.00	0.50 6.50	\$ 862.50 \$10,367.50
Colin R. Robinson	Of Counsel 2012; Member of NY Bar since 1997; Member of NJ & PA Bars since 2001; Member of DE Bar since 2010	\$1,095.00	1.80	\$ 1,971.00
Peter J. Keane	Of Counsel 2018; Member of PA Bar since 2008; Member of DE & NH Bars since 2010	\$1,150.00 \$1,025.00	11.60 33.20	\$13,340.00 \$34,030.00
Edward A. Corma	Associate 2022; Member of NJ Bar since 2018; Member of PA Bar since 2019; Member of DE Bar since 2020	\$ 725.00	4.20	\$ 3,045.00
Beth D. Dassa	Paralegal	\$ 595.00	0.60	\$ 357.00
Hope R. Daniels	Paralegal	\$ 595.00 \$ 545.00	1.90 5.10	\$ 1,130.50 \$ 2,779.50
Patricia E. Cuniff	Paralegal	\$ 545.00	0.90	\$ 490.50
Andrea R. Paul	Case Management Assistant	\$ 475.00 \$ 425.00	0.10 1.60	\$ 47.50 \$ 680.00
Charles J. Bouzoukis	Case Management Assistant	\$ 475.00 \$ 425.00	0.40 0.80	\$ 190.00 \$ 340.00
Total			69.20	\$69,631.00

Grand Total: \$69,631.00
Total Hours: 69.20
Blended Rate: \$1,006.23

COMPENSATION BY CATEGORY

Project Categories	Total Hours	Total Fees
Asset Analysis/Recovery	1.10	\$ 1,165.00
Asset Disposition	6.40	\$ 7,778.00
Appeals	1.20	\$ 1,378.00
Bankruptcy Litigation	36.50	\$38,073.50
Case Administration	8.40	\$ 4,888.00
Claims Administration and Objections	2.50	\$ 2,202.50
Other Professional Compensation	3.10	\$ 3,733.00
Financing/Cash Collateral/Cash Management	0.20	\$ 205.00
Hearings	2.00	\$ 2,087.50
Litigation (Non-Bankruptcy)	0.80	\$ 920.00
Meetings of and Communications with Creditors	0.80	\$ 877.00
PSZJ Retention	4.60	\$ 4,571.00
Other Professional Retention	0.70	\$ 717.50
Tax Issues	0.90	\$ 1,035.00
Total	69.20	\$69,631.00

EXPENSE SUMMARY

Expense Category	Service Provider³ (if applicable)	Total Expenses
Conference Call	AT&T Conference Call	\$ 2.67
Delivery/Courier Service	Advita	\$ 30.00
Lexis/Nexis - Legal Research		\$160.36
Pacer - Court Research		\$364.60
Postage	US Mail	\$ 43.92
Reproduction Expense		\$ 2.50
Reproduction Scan Expense		\$189.40
Total		\$ 793.45

³ PSZ&J may use one or more service providers. The service providers identified herein below are the primary service providers for the categories described.

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**FIRST AND FINAL APPLICATION FOR COMPENSATION
AND REIMBURSEMENT OF EXPENSES OF
PACHULSKI STANG ZIEHL & JONES LLP, AS
COUNSEL TO THE CHAPTER 7 TRUSTEE, FOR THE
PERIOD FROM AUGUST 29, 2023 THROUGH JULY 31, 2025**

Pursuant to sections 330 and 331 of Title 11 of the United States Code (the “Bankruptcy Code”), and Rule 2016 of the Federal Rules of Bankruptcy Procedure (collectively, the “Bankruptcy Rules”), Pachulski Stang Ziehl & Jones LLP (“PSZ&J” or the “Firm”), Counsel for the Chapter 7 Trustee, hereby submits its First and Final Application for Compensation and for Reimbursement of Expenses for the Period from August 29, 2023 through July 31, 2025 (the “Application”).

By this Application PSZ&J seeks a final allowance of compensation in the amount of \$69,631.00 and actual and necessary expenses in the amount of \$793.45 for a total allowance of \$70,424.45, and payment of the unpaid amount of such fees and expenses, for the period August 29, 2023 through July 31, 2025 (the “Fee Period”). In support of this Application, PSZ&J respectfully represents as follows:

¹ The Debtors in these chapter 7 cases, along with the last four digits of each Debtor’s federal tax identification number include: DeCurtis Holdings LLC (2384) and DeCurtis LLC (9241).

Background

1. On April 30, 2023 (the “Petition Date”), the Debtors filed voluntary petitions for relief under Chapter 11 of the Bankruptcy Code. The cases were converted to Chapter 7 proceedings by order entered August 29, 2023. Alfred Giuliano (“Chapter 7 Trustee”) was appointed as the Chapter 7 Trustee in these cases.

2. The Court has jurisdiction over this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2).

3. The retention of PSZ&J, as counsel to the Chapter 7 Trustee, was approved effective as of August 29, 2023 by this Court’s “Order Granting Application of Alfred T. Giuliano, Chapter 7 Trustee, Pursuant to Sections 327(a) and 328(a) of the Bankruptcy Code, Bankruptcy Rules 2014(a) and 2016, and Local rule 2014-1 for Authority to Employ and Retain Pachulski Stang Ziehl & Jones LLP as Counsel to Chapter 7 Trustee Effective as of August 29, 2023,” signed on or about December 26, 2023 (the “Retention Order”). PSZ&J is to be compensated on an hourly basis, plus reimbursement of expenses.

**PSZ&J’s APPLICATION FOR COMPENSATION AND
FOR REIMBURSEMENT OF EXPENSES**

Compensation Paid and Its Source

4. All services for which PSZ&J requests compensation were performed for or on behalf of the Chapter 7 Trustee.

5. PSZ&J, and any partner, of counsel, or associate thereof, have received no payment and no promises for payment from any source other than the Chapter 7 Trustee for services rendered or to be rendered in any capacity whatsoever in connection with the matters

covered by this Application. There is no agreement or understanding between PSZ&J and any other person other than among the partners, of counsel, or associates of PSZ&J for the sharing of compensation to be received for services rendered in these cases.

Fee Statements

6. The fee statements for the Fee Period are attached hereto as Exhibit A. These statements contain daily time logs describing the time spent by each attorney and paraprofessional during the Fee Period. To the best of PSZ&J's knowledge, this Application complies with sections 330 and 331 of the Bankruptcy Code, and the Bankruptcy Rules. PSZ&J's time reports are initially handwritten by the attorney or paralegal performing the described services. The time reports are organized on a daily basis. PSZ&J is particularly sensitive to issues of "lumping" and, unless time was spent in one time frame on a variety of different matters for a particular billing code, separate time entries are set forth in the time reports. PSZ&J's charges for its professional services are based upon the time, nature, extent and value of such services and the cost of comparable services other than in a case under the Bankruptcy Code. PSZ&J has reduced its charges related to any non-working "travel time" to fifty percent (50%) of PSZ&J's standard hourly rate. To the extent it is feasible, PSZ&J professionals attempt to work during travel.

Actual and Necessary Expenses

7. A summary of actual and necessary expenses incurred by PSZ&J for the Fee Period is attached hereto as part of Exhibit A. PSZ&J customarily charges \$0.10 per page for photocopying expenses related to cases, such as these, arising in Delaware. PSZ&J's

photocopying machines automatically record the number of copies made when the person that is doing the copying enters the client's account number into a device attached to the photocopier.

PSZ&J summarizes each client's photocopying charges on a daily basis.

8. PSZ&J charges \$0.25 per page for out-going facsimile transmissions.

There is no additional charge for long distance telephone calls on faxes. The charge for outgoing facsimile transmissions reflects PSZ&J's calculation of the actual costs incurred by PSZ&J for the machines, supplies and extra labor expenses associated with sending telecopies and is reasonable in relation to the amount charged by outside vendors who provide similar services. PSZ&J does not charge the Trustee for the receipt of faxes in these cases.

9. With respect to providers of on-line legal research services (e.g., LEXIS and WESTLAW), PSZ&J charges the standard usage rates these providers charge for computerized legal research. PSZ&J bills its clients the actual amounts charged by such services, with no premium. Any volume discount received by PSZ&J is passed on to the client.

10. PSZ&J believes the foregoing rates are the market rates that the majority of law firms charge clients for such services. In addition, PSZ&J believes that such charges are in accordance with the American Bar Association's ("ABA") guidelines, as set forth in the ABA's Statement of Principles, dated January 12, 1995, regarding billing for disbursements and other charges.

Summary of Services Rendered

11. The names of the partners and associates of PSZ&J who have rendered professional services in these cases during the Fee Period, and the paralegals and case

management assistants of PSZ&J who provided services to these attorneys during the Fee Period, are set forth in the attached Exhibit A.

12. PSZ&J, by and through such persons, has prepared and assisted in the preparation of various motions and orders submitted to the Court for consideration, advised the Chapter 7 Trustee on a regular basis with respect to various matters in connection with the Debtors' bankruptcy cases, and performed all necessary professional services which are described and narrated in detail below. PSZ&J's efforts have been extensive due to the size and complexity of the Debtors' bankruptcy cases.

Summary of Services by Project

13. The services rendered by PSZ&J during the Fee Period can be grouped into the categories set forth below. PSZ&J attempted to place the services provided in the category that best relates to such services. However, because certain services may relate to one or more categories, services pertaining to one category may in fact be included in another category. These services performed, by categories, are generally described below, with a more detailed identification of the actual services provided set forth on the attached Exhibit A. Exhibit A identifies the attorneys and paraprofessionals who rendered services relating to each category, along with the number of hours for each individual and the total compensation sought for each category.

A. Asset Analysis and Recovery

14. This category relates to asset analysis and recovery issues. During the Fee Period, the Firm, among other things, performed research regarding assets, and corresponded regarding asset analysis and recovery issues.

Fees: \$1,165.00; Hours: 1.10

B. Asset Disposition

15. This category relates to the sale or other disposition of assets. During the Fee Period, the Firm, among other things: (1) reviewed and analyzed foreclosure issues; (2) reviewed and analyzed funds turnover issues; and (3) corresponded and conferred regarding asset disposition issues.

Fees: \$7,778.00; Hours: 6.40

C. Appeals

16. This category relates to work regarding appellate issues. During the Fee Period, the Firm, among other things: (1) reviewed and analyzed appellate issues; (2) reviewed and analyzed issues regarding a stipulation and order to dismiss appeals; and (3) corresponded and conferred regarding appellate issues.

Fees: \$1,378.00; Hours: 1.20

D. Bankruptcy Litigation

17. This category relates to work regarding motions or adversary proceedings in the Bankruptcy Court. During the Fee Period, the Firm, among other things: (1) reviewed and analyzed issues regarding a notice of hearing; (2) performed work regarding a notice of status conference; (3) prepared for and attended a status conference on September 11, 2023;

(4) reviewed and analyzed issues regarding the Carnival litigation; (5) attended to scheduling and deadline issues; (6) reviewed and analyzed issues regarding UnumX; (7) performed work regarding Agenda Notices and Hearing Binders; (8) prepared for and attended a hearing on November 15, 2023 regarding the Disney Cruise Line motion to modify injunction; (9) reviewed and analyzed discovery and privilege issues; (10) performed work regarding a stipulation with UnumX regarding email production; (11) performed work regarding a status report; and (12) conferred and corresponded regarding bankruptcy litigation matters.

Fees: \$38,073.50; Hours: 36.50

E. Case Administration

18. This category relates to work regarding administration of these cases. During the Fee Period, the Firm, among other things: (1) maintained service lists; (2) maintained a memorandum of critical dates; (3) maintained document control; and (4) conferred and corresponded regarding case administration issues.

Fees: \$4,888.00; Hours: 8.40

F. Claims Administration and Objections

19. This category relates to work regarding claims administration and claims objections. During the Fee Period, the Firm, among other things: (1) reviewed and analyzed secured claim issues; (2) performed research; (3) reviewed and analyzed the Blueed administrative claim motion; and (4) corresponded regarding claim issues.

Fees: \$2,202.50; Hours: 2.50

G. Other Professional Compensation

20. This category relates to work regarding the compensation of professionals, other than the Firm. During the Fee Period, the Firm, among other things: (1) reviewed and analyzed Chapter 11 final fee applications and a final fee order; (2) performed research; and (3) corresponded regarding compensation issues.

Fees: \$3,733.00; Hours: 3.10

H. Financing/Cash Collateral/Cash Management

21. This category relates to financing, use of cash collateral, and cash management issues. During the Fee Period, the Firm, among other things, reviewed and analyzed Debtor in Possession financing issues.

Fees: \$205.00; Hours: 0.20

I. Hearings

22. This category relates to issues regarding Court hearings. During the Fee Period, the Firm, among other things, prepared for and attended hearing on November 1 and December 27, 2023, and on January 30, 2024, and corresponded regarding hearing issues.

Fees: \$2,087.50; Hours: 2.00

J. Litigation (Non-Bankruptcy)

23. This category relates to litigation in courts other than the Bankruptcy Court. During the Fee Period, the Firm, among other things, reviewed and analyzed issues regarding a notice of settlement relating to Carnival.

Fees: \$920.00; Hours: 0.80

K. Meeting of and Communications with Creditors

24. This category relates to meeting of creditors and communications with creditors issues. During the Fee Period, the Firm, among other things, prepared for and attended a Section 341 meeting of creditors on November 1, 2023.

Fees: \$877.00; Hours: 0.80

L. PSZJ Retention

25. This category relates to issues regarding retention of the Firm. During the Fee Period, the Firm, among other things, performed work regarding its retention application and order.

Fees: \$4,571.00; Hours: 4.60

M. Other Professional Retention

26. This category relates to issues regarding retention of professionals, other than the Firm. During the Fee Period, the Firm, among other things, performed work regarding the GMCO retention application.

Fees: \$717.50; Hours: 0.70

N. Tax Issues

27. This category relates to tax issues. During the Fee Period, the Firm, among other things, performed work regarding an IRS authorization letter.

Fees: \$1,035.00; Hours: 0.90

Valuation of Services

28. Attorneys and paraprofessionals of PSZ&J expended a total 69.20 hours in connection with their representation of the Chapter 7 Trustee during the Fee Period, as follows:

Name of Professional Individual	Position of the Applicant, Number of Years in that Position, Prior Relevant Experience, Year of Obtaining License to Practice, Area of Expertise	Hourly Billing Rate (including Changes)	Total Hours Billed	Total Compensation
Bradford J. Sandler	Partner 2010; Member of NJ & PA Bars since 1996; Member of DE Bar since 2001; Member of NY Bar since 2008	\$1,725.00 \$1,595.00	0.50 6.50	\$ 862.50 \$10,367.50
Colin R. Robinson	Of Counsel 2012; Member of NY Bar since 1997; Member of NJ & PA Bars since 2001; Member of DE Bar since 2010	\$1,095.00	1.80	\$ 1,971.00
Peter J. Keane	Of Counsel 2018; Member of PA Bar since 2008; Member of DE & NH Bars since 2010	\$1,150.00 \$1,025.00	11.60 33.20	\$13,340.00 \$34,030.00
Edward A. Corma	Associate 2022; Member of NJ Bar since 2018; Member of PA Bar since 2019; Member of DE Bar since 2020	\$ 725.00	4.20	\$ 3,045.00
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Patricia E. Cuniff	Paralegal	\$ 545.00	0.90	\$ 490.50
Andrea R. Paul	Case Management Assistant	\$ 475.00 \$ 425.00	0.10 1.60	\$ 47.50 \$ 680.00
Charles J. Bouzoukis	Case Management Assistant	\$ 475.00 \$ 425.00	0.40 0.80	\$ 190.00 \$ 340.00

Grand Total: \$69,631.00

Total Hours: 69.20

Blended Rate: \$1,006.23

29. The nature of work performed by these persons is fully set forth in Exhibit

A attached hereto. These are PSZ&J's normal hourly rates for work of this character. The reasonable value of the services rendered by PSZ&J for the Chapter 7 Trustee during the Fee Period is \$69,631.00.

30. In accordance with the factors enumerated in section 330 of the Bankruptcy Code, it is respectfully submitted that the amount requested by PSZ&J is fair and reasonable given (a) the complexity of the case, (b) the time expended, (c) the nature and extent of the services rendered, (d) the value of such services, and (e) the costs of comparable services other than in a case under the Bankruptcy Code. Moreover, PSZ&J has reviewed the requirements of Del. Bankr. LR 2016-2 and believes that this Application complies with such Rule.

WHEREFORE, PSZ&J respectfully requests that, for the period August 29, 2023 through July 31, 2025, a final allowance be made to PSZ&J for compensation in the amount of \$69,631.00 and actual and necessary expenses in the amount of \$793.45 for a total allowance of \$70,424.45; that payment of such allowed amounts be authorized on a final basis; and for such other and further relief as this Court may deem just and proper.

Dated: September 9, 2025

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Peter J. Keane

Bradford J. Sandler (DE Bar No. 4142)

Peter J. Keane (DE Bar No. 5503)

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Counsel to Alfred T. Giuliano, Chapter 7 Trustee

VERIFICATION

Peter J. Keane verifies the following:

- a) I am an attorney with the applicant law firm Pachulski Stang Ziehl & Jones LLP, and have been admitted to appear before this Court.
- b) I am familiar with many of the legal services rendered by Pachulski Stang Ziehl & Jones LLP as counsel to the Chapter 7 Trustee.
- c) I have reviewed the foregoing Application and the facts set forth therein are true and correct to the best of my knowledge, information and belief. Moreover, I have reviewed Del. Bankr. LR 2016-2 and submit that the Application substantially complies with such Rule.

/s/ Peter J. Keane

Peter J. Keane